

REMARKS

Reconsideration and allowance of the subject application in view of the following remarks is respectfully requested.

Claims 1, 3-5, 7-14, and 16-22 are pending in the application. The claims remain unchanged notwithstanding the Examiner's art rejections which are respectfully traversed for at least the following reasons.

1. As to all independent claims, the applied reference does not fairly teach or suggest the feature that the connecting element connects a neutral point of the alternating current circuit to a reference potential point having little potential variation.

In contrast, in Figs. 1 and 8 of the Ayano reference, as described in column 5, lines 1-16, the casing of motor 5 (i.e., a motor frame) is ground by grounding line 6, and common mode current circulation line 7 is connected to grounding line 6. Thus, common mode current circulation line 7 is not connected to the neutral point of motor 5, but to the casing of motor 5, unlike the claimed inventions.

In Figs. 9 to 13 of the Ayano reference, common mode current circulation line 7 is not connected to the grounding portion of motor 5; rather it is connected to the neutral point of the common mode current outlet 9 (i.e., the Y-connection capacitor circuit). Column 7, lines 20-23.

In this embodiment of the Ayano reference, if a capacitance value of each capacitor 91 of common mode current outlet 9 is increased, an excessive differential-mode current will follow from power converter 2 into each capacitor 91. In this case, a differential-mode inductor should be connected to power converter 2 in order to suppress such an excessive differential-mode current. Thus, the differential-mode inductor is larger than common-mode inductor 3 (i.e., a PG coil).

Further, if a capacitance value of each capacitor 91 of common mode current outlet 9 is decreased, the differential-mode current can be suppressed, but the differential-mode voltage, which is generated from power converter 2, cannot be suppressed. As a result, a leakage current, which flows from motor 5, cannot be suppressed.

In contrast, in the disclosed embodiments of the claimed present invention, since connecting element 12 is connected to the neutral point of the AC circuit 3 (e.g., a motor), the differential-mode voltage, which is generated from power converter 2, can be suppressed without requiring any Y-connection capacitor circuit. As a result, a leakage current, which might flow from AC circuit 3, can be suppressed without requiring any differential-mode inductor connected to power converter 2.

Accordingly, Applicants respectfully submit that the applied reference of *Ayano* either (i) teaches connecting line 7 to a casing, rather than a neutral point, of motor 5 as shown in FIGs. 1-8, or (ii) teaches away from connecting line 7 to a neutral point of motor 5 as shown in FIGs. 9-13. The former configuration, i.e., FIGs. 1-8 of *Ayano*, does not anticipate the claimed invention, whereas the latter configuration, i.e., FIGs. 9-13 of *Ayano*, is inferior to the claimed invention for at least the reasons advanced immediately above.

Therefore, the applied reference does not anticipate the claimed invention of the independent claims.

2. As to independent claims 1, 5 and 14, the applied reference does not fairly teach or suggest the feature that the connecting element includes a capacitor and a resistor connected in series.

In the embodiments shown in FIGs. 1-8 of *Ayano*, a capacitor is missing.

In the embodiments shown in FIGs. 12-13 of *Ayano*, capacitor(s) 91 and resistor(s) 92 are disclosed. However, as best seen in FIGs. 9-11 of *Ayano*, the circuit consisting of such capacitor(s)

91 and resistor(s) 92 does not meet the claim requirement of the claimed connecting element, i.e., connect to a neutral point of the alternating current circuit.

Ayano fails to teach or suggest, in an enabling manner, a single embodiment in which line 7 both connects to a neutral point of motor 5, and includes capacitor(s) and resistor(s) connected in series. The former, i.e., neutral point, is missing from all embodiments as argued with respect to point 1 above, whereas the latter, i.e., capacitor(s), is not required in the embodiments of FIGs. 1-8.

Therefore, the applied reference does not anticipate the claimed invention of independent claims 1, 5, and 14.

3. As to dependent claims 9 and 12, note the above discussion with respect to claims 1, 5 and 11.

4. As to dependent claims 18-22, the Examiner has not explained how the reference teaches the limitations of claims 18-22 which specifically distinguish the claimed connecting element from line 7 of the reference in many different aspects, as discussed in the previous Amendment, at page 11. As can be seen in FIGs. 2-3 of *Ayano*, line 7 clearly extends through common mode choke 3 contrary to claim 18, or has a portion that extends through and hence forms a part of common mode choke 3 contrary to claim 19, or is an integral part and hence not separated from common mode choke 3 contrary to claim 20, or is not free of magnetic coupling to common mode choke 3 due to the portion extending through choke 3 contrary to claim 21, or has a portion that extends through and hence forms a part of and is located inside common mode choke 3 contrary to claim 22.

Clarification is respectfully requested if the Examiner insists that claims 18-22 are anticipated by *Ayano*.

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Accordingly, all claims in the present application are now believed in condition for allowance. Early and favorable indication of allowance is courteously solicited.

The Examiner is invited to telephone the undersigned, Applicant's attorney of record, to facilitate advancement of the present application.

To the extent necessary, a petition for an extension of time under *37 C.F.R. 1.136* is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 07-1337 and please credit any excess fees to such deposit account.

Respectfully submitted,

LOWE HAUPTMAN & BERNER, LLP



Benjamin J. Hauptman
Registration No. 29,310

USPTO Customer No. 22429
1700 Diagonal Road, Suite 310
Alexandria, VA 22314
(703) 684-1111
(703) 518-5499 Facsimile
Date: October 2, 2007
BJH:KL/tal